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March 22, 2017

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Exempt Ex Parte Presentation  
Filed Pursuant to Rule 1.204(a)(10)

Re: Section 43.62 Reporting Requirements for U.S. Providers of International Services, IB Docket No. 17-55  
2016 Biennial Review of Telecommunications Regulations, IB Docket No. 16-131

Dear Ms. Dortch:

At the request of the Office of Commissioner O'Rielly, at approximately 4.30 pm on March 21, 2017, Joan Marsh of AT&T spoke with Erin McGrath of Commissioner O'Rielly's office and provided the following information on the time required to prepare the annual international traffic and revenue report required by section 43.62(a)(2) of the Commission's rules.

As AT&T has previously informed the Commission, the preparation of the current international traffic and revenue report requires approximately 300 hours. This time estimate covers the time required to prepare the annual report for AT&T's subsidiary AT&T Corp., which holds AT&T's international facilities-based authorizations. The relevant instructions require AT&T Corp. to provide the following information for facilities-based traffic: customer revenue, minutes completed on foreign networks, and settlement payouts for each international route (e.g., US-France, US-Germany). AT&T Corp. is also required to further disaggregate minutes completed on foreign networks on each international route into minutes completed on fixed-line networks and minutes completed on mobile networks. Additionally, AT&T Corp. must disaggregate its world total revenues by customer category and routing arrangement. Since data is not maintained in accordance with these various categories in the normal course of business, AT&T must extract the necessary data from the different systems that contain the data for the separate businesses that serve consumer and business customers for these services, and aggregate, disaggregate or otherwise reformulate this data as necessary to comply with the various required formats. AT&T also must obtain the data required to report the required information for AT&T Corp.'s other services, including minutes and revenues for international resale traffic, foreign traffic sent via the US to other foreign points, international private line service revenues, and miscellaneous service revenues. The completion of the annual traffic report for AT&T Corp. involves eight AT&T personnel in different areas of AT&T's business

and, as noted, approximately 300 total hours. This does not include any time required to train new personnel on these requirements, file any necessary revisions to the report, or respond to any questions from Commission staff. This estimate also does not include the preparation time for the separate annual traffic and revenue reports required for AT&T Mobility LLC and several other AT&T affiliates that provide international calling services on a resale basis.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules.

This contact was not previously reported as the result of an inadvertent oversight. AT&T respectfully requests that the Commission waive the requirements of Rule 1.206 to the extent such waiver may be required.

Sincerely,

A handwritten signature in black ink, reading "Amy L. Alvarez". The signature is written in a cursive style with a large, stylized "A" and a long, sweeping tail on the "z".

cc: Erin McGrath